

IN THE MIDDLE DISTRICT OF NORTH CAROLINA
4TH CIRCUIT DISTRICT COURT



USA v. MORGAN, DONALD

1:14-cr-194-1

1:14-cr-414-1

1:20-cv-00965

MOTION FOR COMPASSIONATE RELEASE,
RESENTENCING RELIEF UNDER 3582(c)

I, DONALD RAY MORGAN, APPEAR TODAY 8 July 21 BEFORE THE HONORABLE JUDGE THOMAS D. SCHROEDER HUMBLY AND RESPECTFULLY TO APPEAL FOR RELIEF UNDER 3582(c).

I AM LIMITED IN LEGAL RESOURCES, ASSISTANCE AND FORMAL EDUCATION OF LEGAL PROCEDURES AND LANGUAGE. I HAVE ALSO BEEN OPPRESSED IN SOLITARY CONDITIONS AT USP MARION CIVIL UNDER THE AUTHORITY OF "IRS" KATHY HILL AND WARDEN DANIEL SPROUL OVER 6 MONTHS NOW. I HAVE NOT ANY DISCIPLINARY ISSUE NOR MISCONDUCT EXCEPT ACCORDING TO KATHY HILL "I AM A MUSLIM". I HAVE FILED SEVERAL LETTERS OF CIVIL, CRIMINAL AND RELIGIOUS VIOLATION COMPLAINTS TO THE OFFICE OF THE INSPECTOR GENERAL AS WELL AS TO FBIOP OFFICE OF INTERNAL AFFAIRS FOR IMMEDIATE INVESTIGATIONS INTO KATHY HILL, DANIEL SPROUL AND OTHERS MISCONDUCTS OF RELIGIOUS BIAS, DISCRIMINATION AND ABUSE OF AUTHORITY, NONE OF WHICH HAS BEEN REPLIED TO. I PRAY THAT BY GOD'S MERCY AND GRACE WHAT I LACK OR FALL SHORT IN REGARDS TO A PERFECTLY CITED AND COMPOSED MOTION TO ANY PRACTICING LAWYERS STANDARDS WILL BE COMPENSATED BY MY HONEST, GENUINE APPEAL TO YOUR WISDOM, REASON AND COMPASSION AS A JUDGE, MAN, FATHER AND A SON.

IN MY 7 YEARS OF CUSTODY, I HAVE BEEN KEPT INTO SOLITARY ISOLATION APPX 1/2 OF THAT TIME. SUBJECTED TO INTENSE HEAT, DEPRIVED OF PROPER RECREATION, CONTACT TO MY FAMILY,

BIAS, HATRED AND DISCRIMINATION AGAINST MY FAITH WELL BEYOND RFRA & GUIDANCE.

SO JUDGE SCHROEDER, I AM APPEALING TO YOU TO CONSIDER THE FOLLOWING POINTS THAT IN THE END, UNDER YOUR AUTHORITY UNDER 3582(c), YOU, BY GOD'S MERCY WILL OFFER ME RELIEF THROUGH RESCINDENCE OR RESTRUCTURE OF MY SENTENCE.

ELEMENTS FOR YOUR CONSIDERATION

1. MY MOTHER'S BATTLE WITH CANCER, DIABETES, LUNG TUMORS ETC ARE WELL KNOWN TO YOU FOR YOU KINDLY RESPONDED TO AN EARLY LETTER FOR TRANSFER TO A CLOSER PRISON TO HER. SADLY, I HAD TO ACCEPT YOUR AUTHORITY DID NOT ALLOW YOU TO DIRECT BOP TRANSFERS, BUT I WAS GRATEFUL FOR YOUR KIND ACKNOWLEDGEMENT ABOUT MY MOTHER. THIS IS ONE OF MY MOST IMPORTANT REASONS FOR MY MOTION THAT. DESPITE YOUR INABILITY TO TRANSFER ME, YOU DO HAVE AN ABILITY TO MODIFY MY SENTENCE TO CONCURRENT. YOU COULD ALSO MODIFY MY SENTENCE TO 10 YEARS FROM 15 YEARS THIS ALONE WOULD MAKE SEEING MY MOTHER AGAIN, CARING FOR HER BEFORE SHE MAY PASS A REALITY.
2. AS I SPOKE OF ABOVE, I AM CONFIDENT THAT YOUR SENTENCE UPON ME WAS AN IMPRISONMENT OF TIME NOT TO BE SUBJECTED TO INSULT, BIAS, HATRED AND RETALITORY ACTIONS AGAINST ME FOR SIMPLY BELIEVING IN GOD ALONE AS A MUSLIM. UNLESS MY CRIME WAS MY FAITH? However, UNDER THE AUTHORITY OF KATHY HILL (IRS), I HAVE BEEN UNJUSTLY HARASSED, OPPRESSED AND DISRESPECTED ABOUT MY FAITH TO INCLUDE HER PUTTING ME IN SOLITARY CONFINEMENT FOR YEAR AT TIME, CURRENTLY I AM 6 MONTHS IN SOLITARY.

3 I HAVE FILED GRIEVANCES, COMPLAINTS (CRIMINAL AND CIVIL) TO OIG & BOP OIA FOR MONTHS CALLING FOR AN INVESTIGATION INTO THE CMU, CTU, KATHY HILL, WARDEN SPROUL AND OTHERS WITH NO REPLY OR RELIEF.

4 MY DESPERATION FOR RELIEF AND HELP AGAINST MONTHS OF DEPRIVING ME OF AIR FLOW (FRESH), VENTILATION FROM RISING HEAT, SOLITARY ISOLATION, ATTEMPTS TO PLACE ME INTO THE SMU AND NOW ADX IN FLORENCE, CO. FOR NOTHING MORE THAN BEING A MUSLIM? HAS LEFT ME WITH NO OTHER AVENUE BUT BEGIN A HUNGER STRIKE. I AM NOW REFUSING TO EAT RISKING HARM TO MY BODY AND ORGANS AND ALSO MY MENTAL WELLBEING, BY THE TIME YOU MAY RECEIVE THIS I COULD VERY WELL HAVE BEEN A WEEK OR MORE WITHOUT FOOD.

5 IRONICALLY, AS ALL OF THIS IS BEEN ORCHESTRATED AND CONDUCTED BY KATHY HILL THROUGH FALSE REPORTS, JAILSNITCHES, ETC., I HAVE NO VIOLATIONS OF CONDUCT? IN FACT, MY CONDUCT HAS BEEN CLEAR 2 1/2 YEARS. I AM REFUSED A TRANSFER CLOSER TO MY MOTHER CITING AS A MUSLIM I MUST REMAIN IN THE CMU - COMMUNICATION MGMT UNIT TO MONITOR MY WORDS. HOWEVER, FOR YEARS I HAVE ONLY COMMUNICATED WITH MY MOTHER AND SON. MORE IMPORTANTLY, I HAVE NOT ENGAGED IN WRITINGS OR COMMUNICATIONS BTC DEEMED "RADICALIZING", MY GOAL IS TO RETURN TO MOTHER AND SON. SHOULD YOUR HONOR SEE MY COMMUNICATIONS FOR SEVERAL YEARS NOW WOULD JUDGE MY CLAIM TRUTHFUL.

6. I HAVE COMPLETE BOP ~~RE~~ REENTRY PROGRAMS SUCH AS ANGER MGMT, PTSD VETERANS RESILIENCE, AND CRIMINAL THINKING. I WORKED JOBS IN PRISON AND BEEN A

POSITIVELY MAKING CHANGES IN MYSELF AND MY SURROUNDINGS

7. I HAVE AN OPPORTUNITY UNDER MY REHAIF RIGHTS FOR MY 2255 MOTION TO VACATE MY 922g CONVICTION. IN SHORT, THE ELEMENTS OF THAT CONVICTION WAS I SOLD A LEGAL RIFLE TO A LEGAL NC GUN DEALER. NOT UNDER ANONYMITY, BECAUSE UPON MY RELEASE FROM NC DOC IN APRIL 11, 1999 MY PAROLE OFFICER AND MY UNDERSTANDING OF MY "GUN RIGHTS" WAS THAT I COULD POSSESS LONG RIFLES FOR HUNTING, HOME OR BUSINESS PROTECTION. SO I SOLD A FAMILY GUN ON MY FAMILY'S BUSINESS PROPERTY IN A FULLY LEGAL TRANSACTION. I DID NOT KNOW I WAS VIOLATING ANY LAW. MY 2255 ALSO COMES BEFORE AS AN AVENUE TO RECEIVE RELIEF.

So, JUDGE SCHROEDER, IT IS BASED UPON THE MANY AND VARIED REASONS ABOVE THAT HUMBLY ASK YOU, BY GOD'S MERCY TO EXTEND RELIEF AND CONSIDERATION TO REDUCE AND MODIFY MY SENTENCE.

- THE FIRST RELIEF THAT I ASK FOR IS SIMPLY TO MODIFY MY 2 COUNTS TO RUN CONCURRENT.
- THE SECOND RELIEF WOULD BE TO ADJUST THE 2339B TO A RANGE OF 7 TO 13 YEARS VERSUS THE MANDATORILY MINIMUM IMPOSED AT SENTENCING OF 15. I BELIEVE IN MY HEART HAD YOUR HONOR SENTENCED ME TODAY VERSUS THE TIME OF GREAT MEDIA HYPE, ETC THAT SURROUNDED MY CASE, YOU WOULD HAVE CONSIDERED MORE THE AVERAGE SENTENCES TODAY OF 7 TO 13 YEARS, MY AGE, MY OPPORTUNITY TO RETURN PRODUCTIVELY TO SOCIETY, MY MOM, MY SON. ALSO, I HAVE SERVED APPROX 1/2 OF THE CURRENT 15 YEARS, JUST GIVING ME THE CONCURRENT ADJUSTMENT AND A REDUCTION OF 2339B FROM 15 YEARS TO 10 YEARS, I WOULD

CLOSER TO BEING WITH MY MOTHER & SON. SO THE CONCURRENT ADJUSTMENT WOULD BE THE MOST HOPEFULLY THING I COULD ASK, AND REDUCING THE 15 YEARS TO 10 YEARS WOULD BE A MERCY.

THE LAST RELIEF IS TO ASK THAT UPON MODIFYING MY SENTENCE IN THE FASHION ABOVE, THAT I COULD BE PLACED INTO HOME CONFINEMENT WITH MY MOTHER FOR THE REMAINDER OF MY SENTENCE TO CARE FOR HER, PROVIDE FOR HER IN HER DAYS.

IN CLOSING, I PRAY THAT YOUR HONOR UTILIZES YOUR WISDOM, COMPASSION AND FAIRNESS TO GRANT MY RELIEF UNDER YOUR AUTHORITY THROUGH 3582(c) TO RUN MY SENTENCES CONCURRENTLY, REDUCE THE 2339B FROM 15 YEARS TO 10 YEARS AND A HOME CONFINEMENT WITH MY MOTHER. THANK YOU FOR YOUR TIME, PATIENCE WITH MY LAYMAN'S MOTION AND CONSIDERATION FOR MY RELIEF.

I AFFIRM THIS 8 DAY OF July 2021, THE ABOVE STATEMENTS TO BE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE UNDER PENALTY OF PERJURY.

DR Morgan

DONALD MORGAN 80886053

USP MARION CMC

PO Box 1000

Marion IL 62259